

# ENVIRONMENTAL DEPARTMENT REVIEW COMMENTS

NAVFAC Pacific/Marine Corps Base Hawaii

	DATE 8/31/06	PAGE 1
SUBJECT Draft Final Pesticide Management Plan, PPV	REVIEWED BY: Jason Mori/Michelle Yoshioka/Randall Hu	
ACTIVITY NAVFAC Pacific/Marine Corps Base Hawaii	NAVFAC DWG NO. NA	
LOCATION	SPECIFICATION NO. NA	

DWG NO. OR SPEC PARA. NO.	ITEM NO.	COMMENTS	ACTION
General	1	When will soil test results for MCBH be available? The plan should be revised to not only include Tier 2 EALs, but also to include the test results for each neighborhood. The Parsons Tier 2 memo assumed the presence of 3 pesticide chemicals but the Tier 2 levels should be calculated based on the number of chemicals and levels found in the MCBH testing. Chemicals detected below the PRGs/EALs should be eliminated from further testing and Tier 2 EAL development. Also note that DOH wants testing for technical chlordane instead of separate tests for chlordane, heptachlor and heptachlor epoxide – NAVFAC has the DOH correspondence. Technical chlordane should only count as one chemical.	
General	2	Chemicals detected below the PRGs/EALs should be eliminated from further testing and Tier 2 EAL development.	
Section 1.2	3	Bold sentence that says, "Upon concurrence of the Tier 2 EALs by DOH, this Plan will be updated to reflect the revised approach to pesticide soil management."	
Section 1.4	4	Explain how the SSLs were calculated or reference the source for these values.	
Section 2.2	5	Is the area grided with each grid being one of the 30 locations? Are the samples at a particular depth a composite of the soil at that depth throughout each grid? How many samples to get a composite?	
Section 2.2.1	6	It's unclear when samples will be collected from playgrounds and parks. If grading is being performed in these areas, will samples be collected before or after grading? If after grading, may want to consider multi-incremental sampling.	
Section 2.2	7	Please include rationale for sampling at 2 feet bgs for housing areas and 18 inch bgs for other areas.	
Section 2.3.2	8	Please explain rationale for 18-inch of cover. Section 2.1 refers to DOH memo requiring 6 inch of cover.	

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Section 2.3.3	9	Replace pesticide contaminated with pesticide-impacted.	
Section 2.3.3	10	<p>Section only discusses the disposal of impacted soils that are hazardous waste.</p> <p>Some soils may require disposal at Construction and Demolition landfills such as PVT in Nanakuli, Hawaii.</p> <p>Please provide a procedure for those non-hazardous soils that still require controlled disposal as regulated solid waste. Include shipping paper requirements. Preference for Navy is to include EPA ID numbers on shipping documents for these non-hazardous wastes.</p> <p>Additionally, some soils may be able to be used as cover material at sites such as Waimanalo Gulch Sanitary Landfill (i.e., below industrial PRGs and other permit requirements). Will that be a reuse option?</p>	
Section 2.3.4	11	Wording change, several places: "impacted-soil" instead of "contaminated soil". Indicate that clean soil can also come from onsite and does not only need to be imported	
Section 2.3.4	12	Soil sampling should be conducted prior to grading	
Section 2.3.4	13	<p>Second bullet states "remove the contaminated soil and replace with imported clean soil."</p> <p>Is the intent of this statement to remove all soils above Tier 2 EALs (with confirmation sampling?) or only remove to a certain depth maximum?</p> <p>This similar statement is used on the following page as well. So clarify in those other uses as well.</p>	
Section 2.4.1	14	<p>5<sup>th</sup> bullet talks about covering trucks transporting soil onsite to minimize dust generation.</p> <p>Agree that covering trucks (tarps, etc.) is prudent. However, this effort needs to be used if off-site soil</p>	

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		transport is required as well. For instance, if soils were sent to PVT or Waimanalo Gulch, similar controls would be necessary.	
Section 2.5.2	15	Section discusses Stormwater Pollution Prevention Plans, NPDES permits, etc. For clarification purposes, whose plans are these? Assume it is the PPV Developers plans/permits unless Government has authorized the use of their permits.	
Section 3	16	Need to be clearer on definition of pesticide impacted soil. Suggest revising first sentence of Sec 3.1 to say, "Pesticide impacted soils (soil above Tier 2 EALs)..."	
Section 3	17	Section 3 discusses many controls for the soil. These should be evaluated whether they're necessary – is there a reasonable pathway. If it's determined that the controls are necessary, should evaluate whether it's more cost effective to revise soil management to reduce the number of controls.	
Section 3.3	18	Second bullet discusses records of soil disturbance in pesticide impacted area. However, there is no requirement in the document to identify these areas or track areas where pesticide impacted soils were re-used or covered. Recommend that language be inserted to identify known pesticide impacted soils in the construction drawings (even if soils are placed under foundations).  This will ensure that if there are future developments in those areas, the information will be available in the planning stages.	